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UTAH DEPARTMENT OF COMMERCE

Division of Public Utilities

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Action Request Response

To: Public Service Commission of Utah

From: Utah Division of Public Utilities

Chris Parker, Director
Artie Powell, Manager
Brenda Salter, Utility Technical Consultant Supervisor
Shauna Benvegnu-Springer, Utility Technical Consultant

Date: August 10, 2022

Re: **Docket Nos. 20-057-20, 21-057-02, 22-057-01**, Dominion Energy Utah's Updated Benefit-Cost Test Results for the 2021 Energy Efficiency Programs.

Recommendation (Acknowledge)

The Division of Public Utilities (Division) recommends the Public Service Commission of Utah (Commission) acknowledge the updated benefit-cost test results for the 2021 Energy Efficiency Programs for Dominion Energy Utah (Company).

Issue

On July 14, 2022, the Company filed with the Commission updated benefit-cost test results for the 2021 Energy Efficiency Programs (EE Programs). The Commission issued an Action Request to the Division on July 15, 2022, requesting it review the filing for compliance and to make any recommendations by August 12, 2022. This memorandum addresses the Commission's request.

Background

On May 3, 2022, the Commission reaffirmed the Benefit Cost Information Requirement, which states that the Company appraises the Division of actual participation levels relative to projections and the extent participation levels differ significantly from the projected levels, either positively or negatively, it reports to the Commission expected changes to the Total Resource Cost Test (TRCT), Participant Test (PT), Utility Cost Test (UCT), and Ratepayer

Division of Public Utilities

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Impact Measure (RIM) metrics.¹ The Commission also addressed the requirement in a May 17, 2021, letter acknowledging the Company's 2020 EE Report.

Discussion

The Division reviewed the information the Company submitted to the Commission addressing the Benefit Cost Information Requirement. Despite lower-than-expected participation in 2021, the benefit/cost ratio results of three of the four metrics are above 1 (the exception is for the RIM ratio), which indicates the program's benefits exceed the costs for 2020 and 2021, therefore passing the requirements. The Division notes that multiple measure results are significantly higher than 1, indicating that various rebate measures may need to be evaluated to ensure the correct rebate structure is provided in each incentive. The Division will work with the Advisory Group to review the EE Programs for applicable rebate structures.

Conclusion

The Division acknowledges that the Company has complied with the Benefit Cost Information Requirement as submitted. The Division recommends the Commission acknowledge the updated benefit-cost test results for the 2021 Energy Efficiency Programs for the Company.

cc: Michael A. Orton, Dominion Energy Utah
Michele Beck, Office of Consumer Services

¹ *In the Matter of the Approval of the Conservation Enabling Tariff Adjustment Option and Accounting Orders*, Docket No. 05-057-T01. Order issued January 16, 2007, at 6-7